

D. Maimon Kirschenbaum (DK-2338)
Charles E. Joseph (CJ-9442)
JOSEPH & HERZFELD LLP
757 Third Avenue
25th Floor
New York, NY 10017
Tel: (212) 688-5640
Fax: (212) 688-2548

*Attorneys for Plaintiffs and proposed
collective action and class action members*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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**BRANDON SALUS, and ALAN FELIX
IPANAQUE CORDOVA, on behalf of
themselves and others similarly situated,**

INDEX NO: 07cv03142-GBD-DCF

Plaintiffs,

**FLSA COLLECTIVE ACTION AND
RULE 23 CLASS ACTION**

v.

**TSE GROUP LLC d/b/a B.B. KING BLUES
CLUB AND GRILL and TSION BENSUSAN**

Defendants.

-----X

DECLARATION OF BRANDON SALUS

I, Brandon Salus, under penalty of perjury, affirm as follows:

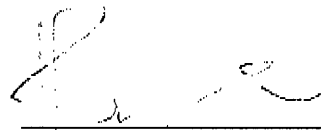
1. My name is Brandon Salus.
2. I was employed by TSE Group as a server at B.B. King Blues Club ("B.B. King") from December 2006 until March 2007.

3. I was informed by B.B. King's management that its practice is to charge an employee for a customer's bill when that customer does not pay his bill. For example, when a customer walks out without paying his bill (a "walk-out"), the restaurant forces the waiter to pay for the customer's bill.

4. I myself was a victim of this practice. On one occasion, I was forced to pay \$244.90 out of my weekly pay to cover for a walk-out. The walk-out deduction is reflected on my attached paystubs; \$200 was deducted from my pay and tips in the first week, and the second week BB King deducted the remaining \$44.90. I also noticed other servers being charged for walk-outs as well.

I affirm, under penalty of perjury, that the above and foregoing information is true and correct.

Dated: New York, New York
June 21, 2007



Brandon Salus

TSE GROUP LLC

CK.# 43421

EMP. #	DEPT.	NAME		S.S.C. #	PAY PERIOD	CHK DATE		
S147	10	BRANDON SALUS			02/18/07	02/23/07		
HOURS		EARNINGS			DEDUCTIONS			
REG.	O.T.	TYPE	RATE	AMOUNT	TYPE	AMOUNT		
22.75		REG PAY	4.6000	104.65				
		TIPS CC		126.88				
		REG PAY		-200.00				
		MISC		-5.00				
	GROSS	F.I.C.A.	FED.	STATE	LOCAL	SUI/SDI	TOTAL DED.	NET PAY
CURRENT	26.53	2.02				0.13	2.15	24.38
YTD	3724.85	284.94	385.41	133.09	83.67	4.33		

TSE GROUP LLC

CK.# 43557

EMP. #		DEPT.		NAME		S.S.C. #		PAY PERIOD		CHK DATE	
S147		10		BRANDON SALUS		[REDACTED]		02/25/07		03/02/07	
HOURS				EARNINGS							
REG.		O.T.		TYPE		RATE		AMOUNT		DEDUCTIONS	
16.25				REG PAY		4.6000		74.75			
				TIPS CC				126.88			
				MISC				-44.90			
				MISC				-5.00			
CURRENT		GROSS		F.I.C.A.		FED.		STATE		SUI/SDI	
		151.73		11.61		3.54				TOTAL DED.	
YTD		3876.58		296.55		388.95		133.09		NET PAY	
								0.69		0.60	
								84.36		16.44	
								4.93		135.29	

EXEMPT S 1